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*Counsel for the Plaintiff,  
 Howard M. Ehrenberg in his capacity  
 as Liquidating Trustee of Orion Healthcorp, Inc., et al.,*

UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
	:	
ORION HEALTHCORP, INC <sup>1</sup> .	:	Case No. 8-18-71748 (AST)
	:	
----- Debtors. -----	:	(Jointly Administered)
	:	
HOWARD M. EHRENBURG IN HIS CAPACITY	:	Adv. Pro. No. 8-20-08044 (AST)
AS LIQUIDATING TRUSTEE OF ORION	:	
HEALTHCORP, INC., ET AL.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
AMERICAN EXPRESS TRAVEL RELATED	:	
SERVICES COMPANY, INC.,	:	
	:	
Defendant(s).	:	
-----	:	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Orion Healthcorp, Inc. (7246); Constellation Healthcare Technologies, Inc. (0135); NEMS Acquisition, LLC (7378); Northeast Medical Solutions, LLC (2703); NEMS West Virginia, LLC (unknown); Physicians Practice Plus Holdings, LLC (6100); Physicians Practice Plus, LLC (4122); Medical Billing Services, Inc. (2971); Rand Medical Billing, Inc. (7887); RMI Physician Services Corporation (7239); Western Skies Practice Management, Inc. (1904); Integrated Physician Solutions, Inc. (0543); NYNM Acquisition, LLC (unknown) Northstar FHA, LLC (unknown); Northstar First Health, LLC (unknown); Vachette Business Services, Ltd. (4672); Phoenix Health, LLC (0856); MDRX Medical Billing, LLC (5410); VEGA Medical Professionals, LLC (1055); Allegiance Consulting Associates, LLC (7291); Allegiance Billing & Consulting, LLC (7141); New York Network Management, LLC (7168). The corporate headquarters and the mailing address for the Debtors listed above is 1715 Route 35 North, Suite 303, Middletown, NJ 07748.

**STIPULATION REQUESTING ADJOURNMENT OF HEARING DATE**

Plaintiff, Howard Ehrenberg, in his capacity as Liquidating Trustee of Orion Healthcare, Inc. (the “Plaintiff”) and Defendant American Express Travel Related Services Company, Inc. (“Defendant”), by and through their undersigned counsel of record, stipulate as follows:

**RECITALS.**

Plaintiff and Defendant, each by and through their respective undersigned attorney, hereby stipulate and agree to adjourn the Pre-trial Conference set for December 8, 2020 at 11:30 a.m:

1. On March 12, 2020, Plaintiff filed a complaint [Dkt. No. 1] against Defendant.
2. The Summons [Dkt. No. 2] was issued by the Clerk’s Office on March 13, 2020.
3. On March 19, 2020, Defendant was served with the summons and complaint.
4. On July 13, 2020, Defendant filed Defendant’s Answer And Affirmative Defenses To Complaint For Avoidance And Recovery Of (1) Preferential And Or Fraudulent Transfers And (2) Objection To Claim No. 69 Pursuant To 11 U.S.C. §§ 502, 547, 548 & 550 [Dkt. No. 8].
5. This is a large adversary in excess of one million dollars involving multiple accounts and theories of recovery. Defendant and Plaintiff have met and conferred over the past 90 days exchanging documents and in an effort to confirm the underlying facts and transfers. Given the number of transfers at issue, and the current pandemic the process is still ongoing.
6. The parties are seeking an additional time to exchange documents surrounding the basis for the Transfers such that the parties can meet and confer on the defenses and the legal issues. The Parties seek a further 90 days given the impending holidays.

**NOW AND THEREFORE, IT IS HEREBY STIPULATED AND AGREED:**

1. The Pre-trial Conference be adjourned to February 21, 2021, \_\_\_\_a.m. (prevailing Eastern Time), or to another date convenient with the Court.

2. Each person who executes this Stipulation represents that he or she is duly authorized to execute this Stipulation on behalf of the respective Parties hereto and that each such party has full knowledge and has consented to this Stipulation.

3. This Stipulation may be executed in one or more counterparts, any of which may be transmitted by facsimile or electronic transmission, and each of which shall be deemed an original, but all of which together shall constitute one and the same document.

Dated: November 24, 2020

**PACHULSKI STANG ZIEHL & JONES LLP**  
Attorneys for Plaintiff Howard M.  
Ehrenberg in his capacity as Liquidating  
Trustee of Orion Healthcorp, Inc., et al

By: /s/ Ilan D. Scharf  
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Dated: November 24, 2020

**ARNALL GOLDEN GREGORY LLP**  
Counsel for Defendant American Express  
Travel Related Services Company, Inc.

By: /s/ Darryl S. Laddin  
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